

## **REMARKS**

The Office Action dated December 31, 2008, has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

## **STATUS OF THE CLAIMS**

Claims 1-37 are currently pending in the application, of which claims 1, 15, 22, 25, 31, and 35-37 are independent claims. Claims 1-7, 9-11, and 13-30 have been amended, and claims 31-37 have been added, to more particularly point and distinctly claim the subject matter of the present invention. No new matter has been added. Claims 1-37 are respectfully submitted for consideration.

## **ALLOWABLE SUBJECT MATTER**

Claims 15-21 and 25-30 were allowed, and claims 3-5, 9, and 12 were objected to as allegedly being dependent upon a rejected base claim, but would be allowable if rewritten independent form including all of the limitations of the base claim and any intervening claims. Applicants thank the Examiner for this indication of allowable subject matter. Applicants respectfully submit that the claims from which claims 3-5, 9, and 12 depend are also allowable, as discussed below. Thus, it is respectfully requested that the objection to claims 3-5, 9, and 12 be withdrawn.

Reconsideration and allowance of claims 3-5, 9, and 12 are therefore respectfully submitted.

### **CLAIM REJECTIONS UNDER 35 U.S.C. 103**

Claims 1-2, 6, 13-14, and 22-23 were rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over U.S. Patent Appln. Pub. No. 2004/0246932 of Fischer (“Fischer”) in view of U.S. Patent Appln. Pub. No. 2002/0176366 of Ayyagari et al. (“Ayyagari”). The Office Action acknowledged that Fischer fails to disclose or suggest all of the features of claims 1-2, 6, 13-14, and 22-23, and cited Ayyagari to remedy the deficiencies of Fischer with respect to these rejected claims. Applicants respectfully submit that each of claims 1-2, 6, 13-14, and 22-23 recites subject matter that is neither disclosed nor suggested in the combination of Fischer and Ayyagari.

Independent claim 1, upon which claims 2-14 depend, is directed to a method including establishing a beacon interval for an ad-hoc network, the beacon interval being established in a first wireless terminal. The method also includes broadcasting beacon frames from the first wireless terminal at the beacon intervals. The first wireless terminal starts to act as a beacon broadcaster in the ad-hoc network and one wireless terminal at a time acts as the beacon broadcaster during normal operation of the ad-hoc network. The method further includes introducing an identifier list into at least some of the beacon frames, the identifier list including identifiers of wireless terminals belonging to the ad-hoc network.

Independent claim 22, upon which claims 23-24 depend, is directed to an apparatus including a transmitter configured to broadcast beacon frames at beacon intervals in an ad-hoc network. The transmitter is configured to insert an identifier list in at least some of the beacon frames, the identifier list including identifiers of wireless terminals belonging to the ad-hoc network.

Applicants respectfully submit that the combination of Fischer and Ayyagari fails to disclose or suggest all of the features of any of the presently pending claims.

Fischer describes a Wireless Local Area Network (WLAN) that supports multiple slot times. A Basic Service Set (BSS)/Independent Basic Service Set (IBSS) of the WLAN services a plurality of WLAN devices (STAs) and at least one STA of a plurality of STAs supports multiple slot times. Operation is initiated using a short slot time. Then, a determination is made that operation of the BSS/IBSS requires use of a long slot time. Operation of at least one of the plurality of STAs is modified to be consistent with the long slot time (*see* Fischer at Abstract).

Ayyagari describes a system and a method for enabling a zero configuration nomadic wireless and wired computing environment presenting a just works experience. The system examines predefined user preference or profile settings to determine to which of a competing number of wireless networks available it should connect, and what type of authentication should be used for such connection. Nomadic wireless computing between infrastructure wireless networks and ad hoc wireless networks may be accomplished without further user intervention required in an auto mode. Also, both

infrastructure only and ad hoc only modes are available through the system. Further, the user may set a preference for infrastructure or ad hoc modes in the auto mode (*see Ayyagari at Abstract*).

Applicants respectfully submit that the combination of Fischer and Ayyagari fails to disclose or suggest all of the features of any of the presently pending claims. Specifically, the combination of Fischer and Ayyagari does not disclose or suggest, at least, “introducing an identifier list into at least some of the beacon frames, the identifier list including identifiers of wireless terminals belonging to the ad- hoc network,” as recited in independent claim 1 and similarly recited in independent claim 22. The Office Action acknowledged that Fischer fails to disclose or suggest these features, and cited Ayyagari to remedy these deficiencies of Fischer. In particular, the Office Action asserted that these features are disclosed by Ayyagari at paragraph 0049. In the cited portion, Ayyagari refers to a computer, known as a station (STA), that presents a list of visible service set identifiers (SSIDs) in an Ad Hoc mode to a user (*see also Ayyagari at paragraph 0038 and 0044*). The list is generated by an initial scanning process, and includes information regarding STAs beaconing in the Ad Hoc mode, and the user may select an Ad Hoc SSID from the list so that the STA associates with a particular cell (*see Ayyagari at paragraph 0049*).

However, Ayyagari does not disclose or suggest introducing the list of SSIDs of Ayyagari into at least some beacon frames. Accordingly, Ayyagari fails to disclose or suggest, at least, “introducing an identifier list into at least some of the beacon frames,”

as recited in independent claim 1 and similarly recited in independent claim 22. As clearly supported in the specification, the identifier list of the claimed invention is broadcast in the beacon frames so that if/when a beacon broadcaster is to be changed, every terminal knows, based on the list, which of the terminals will be the next beacon broadcaster, without having to contend with the other terminals for the broadcasting responsibility (*see* Specification at page 8, lines 16-21). In contrast, the STA of Ayyagari does not send and receive the list of SSIDs via beacon frames, but only generates the list of SSIDs via the initial scanning process, as discussed above (*see also* Ayyagari at paragraph 0011 and 0054).

In addition, Ayyagari fails to disclose or suggest that the list of Ayyagari includes SSIDs of STAs belonging to a single ad-hoc network. Accordingly, Ayyagari does not disclose or suggest, at least, “the identifier list including identifiers of wireless terminals belonging to the ad- hoc network,” as recited in independent claim 1 and similarly recited in independent claim 22. In fact, Ayyagari teaches away from the claimed invention, describing the list of SSIDs of Ayyagari to include information regarding STAs beacons in multiple networks (*see* Ayyagari at paragraph 0011 and 0054). Thus, the combination of Fischer and Ayyagari fails to disclose or suggest, at least, “introducing an identifier list into at least some of the beacon frames, the identifier list including identifiers of wireless terminals belonging to the ad- hoc network,” as recited in independent claim 1 and similarly recited in independent claim 22.

For at least the reasons discussed above, Applicants respectfully submit that the combination of Fischer and Ayyagari does not disclose or suggest all of the elements of independent claims 1 and 22. Accordingly, Applicants respectfully request that the rejection of independent claims 1 and 22 be withdrawn.

Claims 2, 6, 13-14, and 23 depend from, and further limit, independent claims 1 and 22. Therefore, each of claims 2, 6, 13-14, and 23 recite subject matter that is neither disclosed nor suggested in the combination of Fischer and Ayyagari. Accordingly, Applicants respectfully request that the rejections of claims 2, 6, 13-14, and 23 be withdrawn.

Claims 7-8, 10-11, and 24 were rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Fischer in view of Ayyagari and further in view of U.S. Patent Appln. Pub. No. 2002/0131371 of Rudnick (“Rudnick”). The Office Action acknowledged that the combination of Fischer and Ayyagari fails to disclose or suggest all of the features of claims 7-8, 10-11, and 24, and cited Rudnick to remedy the deficiencies of the combination of Fischer and Ayyagari with respect to these rejected claims. Applicants respectfully submit that each of claims 7-8, 10-11, and 24 recites subject matter that is neither disclosed nor suggested in the combination of Fischer, Ayyagari, and Rudnick.

In order for this rejection to be sustainable, the combination of Fischer, Ayyagari, and Rudnick must teach all the recitations of independent claims 1 and 22. Accordingly, the arguments presented above supporting the patentability of independent claims 1 and 22 over the combination of Fischer and Ayyagari are incorporated herein to support the

patentability of dependent claims 7-8, 10-11, and 24. Thus, it is respectfully requested that dependent claims 7-8, 10-11, and 24 be allowed. Rudnick does not cure the deficiencies of the combination of Fischer and Ayyagari.

Rudnick describes a method of changing parameters in an 802.11 WLAN that includes determining a performance metric for the WLAN; monitoring the performance of the WLAN with a monitor management entity; and generating a terminate and reconvene message when the performance of the WLAN drops below a performance metric threshold. The method also includes selecting a reconvene BSS having a reconvene BSSID, changed 802.11 parameters and setting a time for the reconvene BSS to become operational; transmitting the terminate and reconvene message to all STAs in the BSS; and instantiating the reconvene BSS at the set time (*see* Rudnick at Abstract).

However, Rudnick fails to cure the deficiencies of the combination of Fischer and Ayyagari. Similarly to the combination of Fischer and Ayyagari, Rudnick does not disclose or suggest, at least, “introducing an identifier list into at least some of the beacon frames, the identifier list including identifiers of wireless terminals belonging to the ad-hoc network,” as recited in independent claim 1 and similarly recited in independent claim 22. Rudnick is silent as to teaching the particular features associated with the identifier list of independent claims 1 and 22.

Therefore, the combination of Fischer, Ayyagari, and Rudnick would not lead a person of ordinary skill in the art to arrive at the features of the identifier list as recited in independent claims 1 and 22. Consequently, Applicants submit that independent claims 1

and 22 and related dependent claims 7-8, 10-11, and 24 are not obvious over the combination of Fischer, Ayyagari, and Rudnick. Accordingly, Applicants respectfully request that the rejection of claims 7-8, 10-11, and 24 be withdrawn.

Reconsideration and allowance of claims 1-2, 6-8, 10-11, 13-14, and 22-24 are thus respectfully submitted.

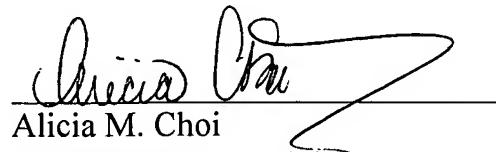
### **CONCLUSION**

For at least the reasons discussed above, Applicants respectfully submit that the cited references fail to disclose or suggest all of the elements of the claimed invention. These distinctions are more than sufficient to render the claimed invention unanticipated and unobvious. It is thus respectfully requested that all of claims 1-37 be allowed, and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, Applicants' undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, Applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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Enclosures: Additional Claim Fee Transmittal  
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